

Pays As You Go, LLC v. Cloudera, Inc.
Exhibit 2 to the Complaint

U.S. Patent No. US 7,013,127 v. Cloudera
Claim 1 is exemplary

Pays As You Go, LLC v. Cloudera, Inc.
Exhibit 2 to the Complaint

1. Claim Chart

Claim	Analysis						
[1.P] A method for affecting payment of telecommunication services, comprising:	<p>Cloudera Inc. (“Company”) performs and/or induces others to perform a method for affecting payment of telecommunication services.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Company provides Cloudera Data Platform (CDP) cloud-native services that allow users to only pay for the services (“payment of telecommunication services”) that are used by the users in a particular period.</p> <div><div>Cloudera Data Platform pricing</div><p>Cloud-native services to secure and manage the data lifecycle in any cloud or data center.</p><table><tr><th>Industry standard</th><th>Updates and support</th><th>Hybrid cloud rates</th></tr><tr><td>Pricing metrics align with norms for cloud-based consumption and subscription for data management and analytics.</td><td>CDP Public and Private Cloud offerings include enterprise-grade technical support as well as version, maintenance, and security updates.</td><td>Public Cloud hourly rates and Private Cloud annual subscriptions are aligned for hybrid cloud and multi-cloud flexibility.</td></tr></table></div> <p>Source: https://www.cloudera.com/products/pricing.html</p>	Industry standard	Updates and support	Hybrid cloud rates	Pricing metrics align with norms for cloud-based consumption and subscription for data management and analytics.	CDP Public and Private Cloud offerings include enterprise-grade technical support as well as version, maintenance, and security updates.	Public Cloud hourly rates and Private Cloud annual subscriptions are aligned for hybrid cloud and multi-cloud flexibility.
Industry standard	Updates and support	Hybrid cloud rates					
Pricing metrics align with norms for cloud-based consumption and subscription for data management and analytics.	CDP Public and Private Cloud offerings include enterprise-grade technical support as well as version, maintenance, and security updates.	Public Cloud hourly rates and Private Cloud annual subscriptions are aligned for hybrid cloud and multi-cloud flexibility.					

Pays As You Go, LLC v. Cloudera, Inc.
Exhibit 2 to the Complaint

	<div data-bbox="489 250 1877 812"> <h2 style="text-align: center;">CDP Public Cloud</h2> <p style="text-align: center;">CDP Public Cloud services run on AWS, Azure, and GCP.</p> <p style="text-align: center;">Use one service or use them all, pay only for what you use with world-class support, and pay monthly or buy prepaid credits.</p> <div> <div> <h3>Data Engineering</h3> <p>Develop, schedule, monitor, and debug data pipelines to streamline ETL processes quickly & securely.</p> <p>Core: \$0.07/CCU All-Purpose: \$0.20/CCU*</p> <p>Hourly rate</p> <p>Learn more ></p> </div> <div> <h3>Data Warehouse</h3> <p>Deploy data warehouses with secure, self-service access to enterprise data.</p> <p>\$0.07/CCU</p> <p>Hourly rate</p> <p>Learn more ></p> </div> <div> <h3>Operational Database</h3> <p>Develop future-proof applications that deliver unparalleled scale, performance, and reliability.</p> <p>\$0.08/CCU</p> <p>Hourly rate</p> <p>Learn more ></p> </div> </div> <p>Source: https://www.cloudera.com/products/pricing.html</p> <div data-bbox="489 883 1877 1084"> <h2 style="text-align: center;">Cloudera Enterprise</h2> <div> <div> <h3>Pay-as-you-go pricing</h3> <p>Reduce cost by utilizing transient clusters, and pay only for the time your workload is running.</p> </div> <div> <h3>Work against cloud-native storage</h3> <p>Run fast batch jobs with Hive and Spark against data in common object storage.</p> </div> <div> <h3>Grow and shrink on demand</h3> <p>Elastically scale your cluster, then shrink or terminate as business demands and SLAs change.</p> </div> </div> <p>Source: https://kr.cloudera.com/products/data-science-and-engineering/data-engineering.html</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p> </div></div>
<p>[1.1] monitoring a user's use of the telecommunication services at regular time intervals;</p>	<p>Company performs and/or induces others to perform the step of monitoring a user's use of the telecommunication services at regular time intervals.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p>

Pays As You Go, LLC v. Cloudera, Inc.
Exhibit 2 to the Complaint

For example, CDP public cloud provides per Cloudera compute unit (CCU) pricing model, where, based upon an hourly rate of the cloud services availed by the user (“monitoring a user’s use of the telecommunication services”), a monthly (“at regular intervals”) invoice is generated.

<p>Data Engineering</p> <p>Develop, schedule, monitor, and debug data pipelines to streamline ETL processes quickly & securely.</p> <p>Core: \$0.07/CCU All-Purpose: \$0.20/CCU*</p> <p>Hourly rate</p> <p>Learn more ></p>	<p>Data Warehouse</p> <p>Deploy data warehouses with secure, self-service access to enterprise data.</p> <p>\$0.07/CCU</p> <p>Hourly rate</p> <p>Learn more ></p>	<p>Operational Database</p> <p>Develop future-proof applications that deliver unparalleled scale, performance, and reliability.</p> <p>\$0.08/CCU</p> <p>Hourly rate</p> <p>Learn more ></p>
<p>Machine Learning</p> <p>Provide collaborative ML workspaces with secure, self-service access to enterprise data.</p> <p>\$0.20/CCU**</p> <p>Hourly rate</p> <p>Learn more ></p>	<p>Data Hub</p> <p>Easily manage clusters running Apache Spark, Hive, Impala, HBase, Phoenix, Kafka, Flink, and more.</p> <p>\$0.04/CCU**</p> <p>Hourly rate</p> <p>Learn more ></p>	<p>Flow Management on Data Hub</p> <p>A premium Data Hub service to ingest, transform and manage streaming data, powered by Apache NiFi.</p> <p>\$0.15/CCU</p> <p>Hourly rate</p> <p>Learn more ></p>

Source: <https://www.cloudera.com/products/pricing.html>

Pays As You Go, LLC v. Cloudera, Inc.
Exhibit 2 to the Complaint

	<div><div>CDP Public Cloud</div><div>CDP Public Cloud services run on AWS, Azure, and GCP.</div><div>Use one service or use them all, pay only for what you use with world-class support, and pay monthly or buy prepaid credits.</div><div>Regular Intervals</div><div><div><div><div>Data Engineering</div><div>Develop, schedule, monitor, and debug data pipelines to streamline ETL processes quickly & securely.</div><div>Core: \$0.07/CCU All-Purpose: \$0.20/CCU*</div><div>Hourly rate</div><div>Learn more ></div></div><div><div>Data Warehouse</div><div>Deploy data warehouses with secure, self-service access to enterprise data.</div><div>\$0.07/CCU</div><div>Hourly rate</div><div>Learn more ></div></div><div><div>Operational Database</div><div>Develop future-proof applications that deliver unparalleled scale, performance, and reliability.</div><div>\$0.08/CCU</div><div>Hourly rate</div><div>Learn more ></div></div></div></div><div>Source: https://www.cloudera.com/products/pricing.html (annotated)</div><div>Further, to the extent this element is performed at least in part by Defendant’s software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</div></div>
<div>[1.2] communicating results of said monitoring to a telecommunication services provider, wherein said telecommunication services provider processes said results and communicates</div>	<div>Company performs and/or induces others to perform the step of communicating results of said monitoring to a telecommunication services provider, wherein said telecommunication services provider processes said results and communicates processed results to said user.</div> <div>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</div> <div>For example, the CDP provides a feature of CDP accounts where the users can access the services and view their monthly invoices (“processed results”). Therefore, it would be apparent to a person having ordinary skill in the art that the monthly bill is generated by the CDP services provider (“said telecommunication services provider processes said results”) after monitoring the usage of the services ("results of said monitoring"), which is then reflected in the users’ CDP accounts (“communicates processed results to said user”).</div>

Pays As You Go, LLC v. Cloudera, Inc.
Exhibit 2 to the Complaint

processed results to
said user; and

CDP accounts

A CDP account (sometimes called a CDP tenant) is the management console where users log in to access their services. A CDP account contains one or more CDP environments.

CDP Accounts

Physically, all management consoles run in a shared infrastructure (the Cloudera Control Plane). Each management console has a unique ID and is logically isolated from other CDP accounts. For example, if you have two CDP accounts, you cannot view the resources in account 2 if you are logged into account 1. Each CDP account, including sub-accounts, has a separate invoice.

Source: <https://docs.cloudera.com/management-console/cloud/overview/topics/mc-cdp-accounts.html>
(annotated)

CDP Public Cloud

CDP Public Cloud services run on AWS, Azure, and GCP.

Use one service or use them all, pay only for what you use with world-class support, and pay monthly or buy prepaid credits.

<h3>Data Engineering</h3> <p>Develop, schedule, monitor, and debug data pipelines to streamline ETL processes quickly & securely.</p> <p>Core: \$0.07/CCU All-Purpose: \$0.20/CCU*</p> <p>Hourly rate</p> <p>Learn more ></p>	<h3>Data Warehouse</h3> <p>Deploy data warehouses with secure, self-service access to enterprise data.</p> <p>\$0.07/CCU</p> <p>Hourly rate</p> <p>Learn more ></p>	<h3>Operational Database</h3> <p>Develop future-proof applications that deliver unparalleled scale, performance, and reliability.</p> <p>\$0.08/CCU</p> <p>Hourly rate</p> <p>Learn more ></p>
--	--	---

Source: <https://www.cloudera.com/products/pricing.html>

Pays As You Go, LLC v. Cloudera, Inc.
Exhibit 2 to the Complaint

	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.
<p>[1.3] receiving a payment from the user, the payment obtained from a payment transaction wherein: a payment is received from the user at a point-of-sale together with an account identifier, data indicative of the payment transaction is received from the point-of-sale by the telecommunication services provider, and an amount of money equal to the amount of payment is received from a point-of-sale proprietor by the telecommunication services provider.</p>	<p>Company performs and/or induces others to perform a step of receiving a payment from the user, the payment obtained from a payment transaction wherein: a payment is received from the user at a point-of-sale together with an account identifier, data indicative of the payment transaction is received from the point-of-sale by the telecommunication services provider, and an amount of money equal to the amount of payment is received from a point-of-sale proprietor by the telecommunication services provider.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, after the monthly invoice is generated in the CDP account ("account identifier"), the user pays the bill ("receiving a payment from the user") for the availed services. Therefore, upon information and belief, the payment for the invoice is received by the telecommunication services provider from the user at a point-of-sale and an amount of money equal to the amount of payment is received from a point-of-sale proprietor by the telecommunication services provider.</p> <p>CDP accounts — Account identifier</p> <p>A CDP account (sometimes called a CDP tenant) is the management console where users log in to access their services. A CDP account contains one or more CDP environments.</p> <p>CDP Accounts</p> <p>Physically, all management consoles run in a shared infrastructure (the Cloudera Control Plane). Each management console has a unique ID and is logically isolated from other CDP accounts. For example, if you have two CDP accounts, you cannot view the resources in account 2 if you are logged into account 1. Each CDP account, including sub-accounts, has a separate invoice.</p> <p>Source: https://docs.cloudera.com/management-console/cloud/overview/topics/mc-cdp-accounts.html (annotated)</p>

Pays As You Go, LLC v. Cloudera, Inc.
Exhibit 2 to the Complaint

A CDP account can have one or more identity providers. Each identity provider is connected to one SAML provider, which in turn is connected to an Active Directory. A CDP account can be connected to multiple Azure Active Directory organizations (via identity provider) and multiple subscriptions. Cloudera creates one CDP account per customer; you can create additional CDP accounts through a manual approvals process.

For example, the "Cloudera CDP Demos" account is connected to:

- 3 identity providers, each connected to an LDAP Server via SAML:
 - Corporate OKTA, so that anybody with a cloudera.com email can log in (as long as they are entitled).
 - An LDAP server used for workshops, so that we can provision temporary users without having to go through corporate account lifecycle management.
 - An LDAP server hosting demo users, so that we can create new personas on demand for demo scenarios.
- Multiple Azure subscriptions; one per budget item (Sales, Product Management, Services, Tradeshow Demos etc.).
- This allows different groups to host their own demos and pay for them using their own cloud account.

Source: <https://docs.cloudera.com/management-console/cloud/overview/topics/mc-cdp-accounts.html>

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

Pays As You Go, LLC v. Cloudera, Inc.
Exhibit 2 to the Complaint

2. List of References

1. <https://www.cloudera.com/products/pricing.html>, last accessed on 19th February 2024.
2. <https://docs.cloudera.com/management-console/cloud/overview/topics/mc-cdp-accounts.html>, last accessed on 19th February 2024.
3. <https://kr.cloudera.com/products/data-science-and-engineering/data-engineering.html>, last accessed on 19th February, 2024.
4. <https://www.cloudera.com/products/pricing/cdp-public-cloud-service-rates.html>, last accessed on 19th February, 2024.